

# **EXHIBIT E**

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*[Attorneys for clients as listed on signature page]*

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

Bankruptcy Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)

(Jointly Administered)

**DECLARATION OF JEREMIAH F.  
HALLISEY, ESQ. IN SUPPORT OF  
JOINDER OF CERTAIN FIRE VICTIMS  
IN WILLIAM B. ABRAMS MOTION TO  
DESIGNATE IMPROPERLY SOLICITED  
VOTES PURSUANT TO 11 U.S.C. §§  
1125(B) AND 1126(E) AND BANKRUPTCY  
RULE 2019**

Date: May 12, 2020

Time: 10:00 a.m.:

Place: Courtroom 17, 450 Golden Gate Ave.,  
16<sup>th</sup> Floor, San Francisco, CA

I, Jeremiah F. Hallisey, declare as follows:

1. I am a member in good standing of the State Bar of California and am the attorney

1 of record for claimants/fire victims William O'Brien, Ming O'Brien, Fuguan O'Brien; Michael  
2 Heinstein, Kye Heinstein, Karen Roberds. Anita Freeman; William N. Steel, and Clinton Reilly in  
3 this proceeding.

4 2. I have personal knowledge of the facts stated herein and I could and would  
5 competently and truthfully testify to those facts if called as witness.

6 3. This Declaration is submitted in support of the Joinder of Certain Fire Victims in  
7 William B. Abrams Motion to Designate Improperly Solicited Votes Pursuant to 11 U.S.C. §§  
8 1125(B) and 1126(E) and Bankruptcy Rule 2019 14 3.

9 4. Attached hereto as **Exhibit 1** is a true and correct copy of the Declaration of Karen  
10 Lynn Ingalls, *Pro Per* Claimant and Fire Victim, dated May 7, 2020. Attached hereto as **Exhibit**  
11 **2** is a true and correct copy of the Declaration of Debbie Pool, *Pro Per* Claimant and Fire Victim,  
12 dated May 7, 2020.

13 I declare under penalty of perjury that the foregoing is true and correct. Executed on May  
14 10, 2020 at San Francisco California.

15  
16 /s/ Jeremiah F. Hallisey  
Jeremiah F. Hallisey  
Hallisey and Johnson, PC  
465 California Street, Suite 405  
San Francisco, CA 94104-1812  
Telephone: (415) 433-5300  
Email: [jfhallisey@gmail.com](mailto:jfhallisey@gmail.com)

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18  
19 Attorneys for William, Ming, and Fuguan O'Brien;  
20 Kye and Michael Heinstein; Clint Reilly; Karen  
21 Roberds and Anita Freeman; and William N. Steel

22 FRANCIS O. SCARPULLA (SBN 41059)  
23 PATRICK B. CLAYTON (SBN 240191)  
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[pbcl@scarpullalaw.com](mailto:pbcl@scarpullalaw.com)

26 Attorneys for GER HOSPITALITY, LLC and  
27 ADOLFO VERONESE FAMILY

28 QUENTIN L. KOPP (SBN 25070)  
DANIEL S. MASON (SBN 54065)  
THOMAS W. JACKSON (SBN 107608)

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[tjackson@fsmllaw.com](mailto:tjackson@fsmllaw.com)

Attorneys for Ken Born, Christine Born, Cathy  
FERENCE, William FERENCE, Allen Goldberg, Robert  
Johnson, Patricia Goodberg, Paul Goodberg,  
Terence Redmond, Melissa Redmond, Sonoma  
Court Shops, Inc., and Rita Godward

1  
2 **CERTIFICATE OF SERVICE**  
3

4 I, Karen J. Chedister, declare as follows:

5 I am over the age of eighteen (18) years and not a party to the within action. My business  
6 address is 465 California street, Suite 405, San Francisco, CA 94104.

7 On May 10, 2020, I served document(s) described as:

8  
9 **DECLARATION OF JEREMIAH F. HALLISEY, ESQ. IN SUPPORT OF JOINDER**  
10 **OF CERTAIN FIRE VICTIMS IN WILLIAM B. ABRAMS MOTION TO**  
11 **DESIGNATE IMPROPERLY SOLICITED VOTES PURSUANT TO 11 U.S.C. §§**  
12 **1125(B) AND 1126(E) AND BANKRUPTCY RULE 2019**

13 on the interested parties in this action as follows:

14 BY E-MAIL/NEF: Service was accomplished through the Notice of Electronic Filing

15 ("NEF") for all parties and counsel who are registered ECF Users and those identified  
16 below:

17 I declare under penalty of perjury under the laws of the United States of America that the  
18 above is true and correct. This declaration was executed on May 7, 2020 at San Francisco,  
19 California.

20 /s/ Karen J. Chedister

21 Karen J. Chedister, Esq.  
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**EXHIBIT 1 TO**

**DECLARATION OF JEREMIAH F. HALLISEY, ESQ. IN SUPPORT OF  
JOINDER OF CERTAIN FIRE VICTIMS IN WILLIAM B. ABRAMS  
MOTION TO DESIGNATE IMPROPERLY SOLICITED VOTES  
PURSUANT TO 11 U.S.C. §§ 1125(B) AND 1126(E) AND BANKRUPTCY  
RULE 2019**

Karen Lynn Ingalls  
108 Ivy Lane  
Calistoga, CA 94515

*Claimant*

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

-and-

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the lead case,  
No. 19-30088 (DM)*

Bankr. Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administrated)

**DECLARATION OF KAREN LYNN  
INGALLS**

I hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a fire claimant in the above-referenced case. I incurred fire damage and losses at 8811 Franz Valley School Road, Calistoga, CA during the Tubbs Fire. My Proof of Claim is number 85774, filed on October 21, 2019. I am not represented by an attorney in the PG&E matter.

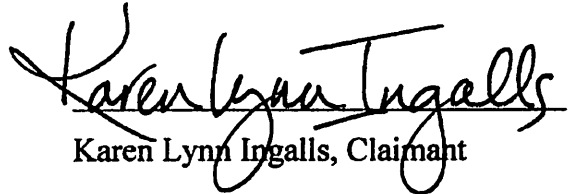
DECLARATION OF KAREN LYNN INGALLS

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1  
2 2. As of May 6, 2020, I had not received the Disclosure Statement, Ballots and related  
3 materials

4 I declare under penalty of perjury pursuant to the Laws of the State of California that, to the  
5 best of my knowledge and after reasonable inquiry, the foregoing is true and correct and that this  
6 declaration was executed at Calistoga on May 7, 2020.

7 108 Ivy Lane

8   
Karen Lynn Ingalls, Claimant

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DECLARATION OF KAREN LYNN INGALLS

2



**EXHIBIT 2 TO**

**DECLARATION OF JEREMIAH F. HALLISEY, ESQ. IN SUPPORT OF  
JOINDER OF CERTAIN FIRE VICTIMS IN WILLIAM B. ABRAMS  
MOTION TO DESIGNATE IMPROPERLY SOLICITED VOTES  
PURSUANT TO 11 U.S.C. §§ 1125(B) AND 1126(E) AND BANKRUPTCY  
RULE 2019**

1 Debbie Pool  
121 Penzance Ave, #152  
2 Chico, CA 95973  
3 Claimant  
4

5 UNITED STATES BANKRUPTCY COURT  
6 NORTHERN DISTRICT OF CALIFORNIA  
7 SAN FRANCISCO DIVISION

8 In re:

9 PG&E CORPORATION,

10 -and-

11 PACIFIC GAS AND ELECTRIC  
12 COMPANY,

13 Debtors.

- 14 ☐ Affects PG&E Corporation  
15 ☐ Affects Pacific Gas and Electric Company  
16 ☒ Affects both Debtors

17 \* All papers shall be filed in the lead case,  
18 No. 19-30088 (DM)  
19  
20

Bankr. Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administrated)

DECLARATION OF DEBBIE POOL

21 I hereby declare under penalty of perjury that the following is true and correct to the best  
22 of my knowledge, information, and belief:

23 1. I am a fire claimant in the above-referenced case. I incurred fire damage and  
24 losses at 9183 Skyway in Paradise, CA during the Camp Fire. My Proof of Claim is number  
25 13959, filed on October 4, 2019. I amended my Proof of Claim on March 11, 2020, to remove  
26 Joseph M. Earley as my attorney.  
27  
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DECLARATION OF DEBBIE POOL

1  
2 2. I engaged Joseph M. Earley III to represent me in connection with my claims  
3 against Debtors. At the time I engaged Mr. Earley, I did not understand that Watts Guerra would  
4 also be representing me and managing my claim.

5 3. I have been urged and pushed to vote to approve the PG&E Plan of  
6 Reorganization since the beginning of February 2020. Attached as Exhibit A are true and correct  
7 copies of two emails urging me to accept the Plan and that I received in February 2020.

8 4. I told Watts Guerra that I was terminating their engagement on February 28,  
9 2020, then again on February 29, 2020, and a third time on March 3, 2020. I spoke to Guy Watts  
10 on March 9, 2020. He asked why I was terminating the relationship, so I gave him several  
11 reasons. He raised his voice and argued with me. I felt rudely treated. I did not get confirmation  
12 that they had closed my file until April 6, 2020.

13 5. Although Guy Watts told me he would close my file on March 12, 2020, I  
14 continued receiving calls, e-mails, and texts URGING me to vote yes. In total, there were seven  
15 texts, twelve calls, and three emails, all about voting through their portal even though I was no  
16 longer a client. Attached as Exhibit B is a true and correct copy of an email I received at 8:23  
17 AM urging me to accept the Plan. Attached as Exhibit C is a true and correct copy of the list of  
18 phone messages I received from Watts Guerra urging me to vote to approve the Plan. Attached  
19 as Exhibit D are true and correct copies of the text messages I received urging me to vote to  
20 approve the Plan.

21 6. To my knowledge, at no time while Watts Guerra was representing me did I  
22 receive any written or verbal disclosures from Watts Guerra regarding its line of credit or  
23 financing arrangements with Centerbridge Partners or Apollo Capital.

24 I declare under penalty of perjury pursuant to the Laws of the State of California that, to  
25 the best of my knowledge and after reasonable inquiry, the foregoing is true and correct and that  
26 this declaration was executed at 11 AM on May 7, 2020.

27 /s/ Debbie Pool

28 Debbie Pool

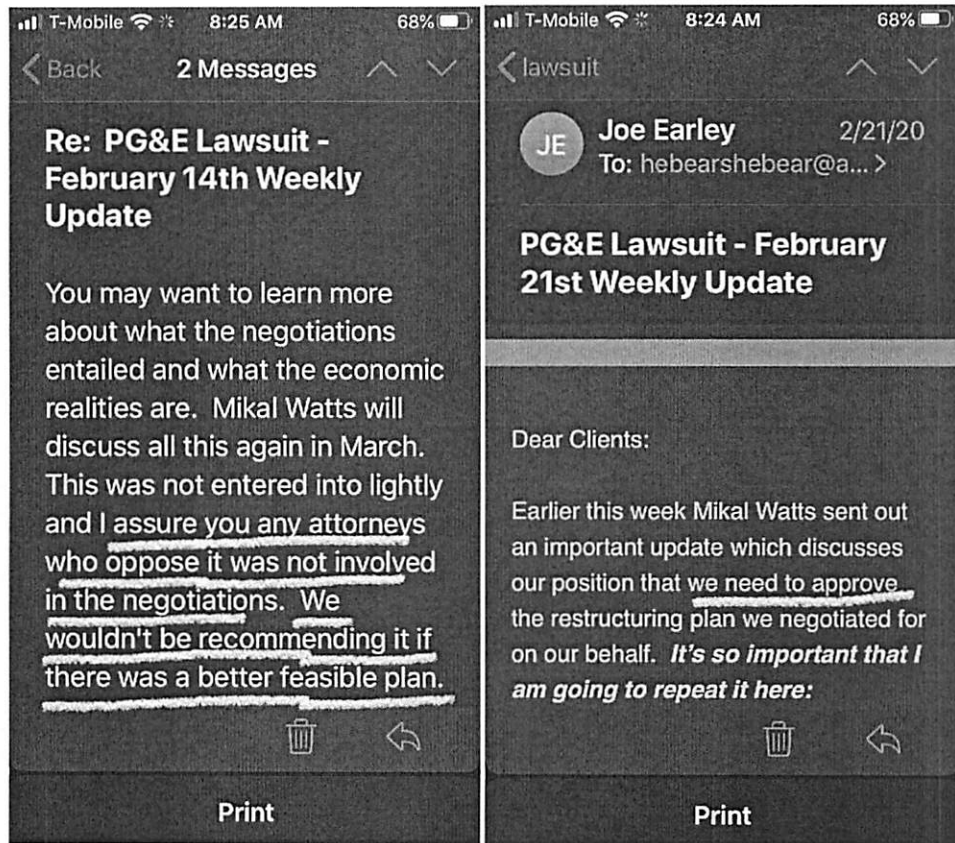
Claimant

DECLARATION OF DEBBIE POOL

2

EXHIBIT A

Vote Solicitation Prior to March 31

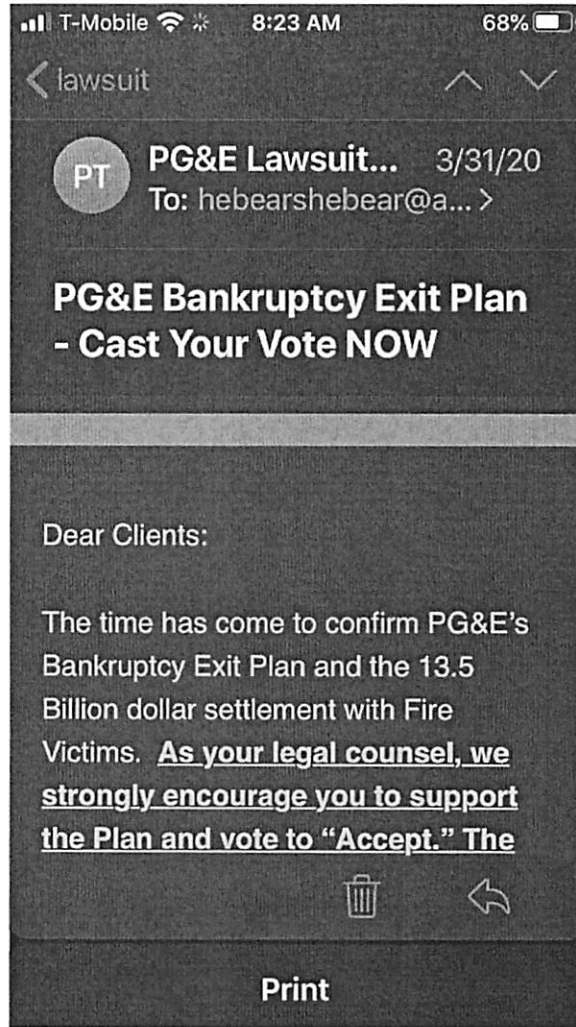


DECLARATION OF DEBBIE POOL

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EXHIBIT B

Vote Solicitation on March 31



DECLARATION OF DEBBIE POOL



EXHIBIT C

Voicemail List

T-Mobile 8:45 AM 61%

Greeting Voicemail Edit

phone 00:42

Lawsuit 3/30/20  
phone 00:35

Lawsuit 3/26/20  
phone 00:33

Lawsuit 3/25/20  
phone 00:36

Lawsuit 3/20/20  
phone 00:34

Guy WATTS 3/6/20  
phone 01:08

George 10/24/19  
mobile 01:02

Favorites Recents Contacts Keypad Voicemail

T-Mobile 8:44 AM 61%

Greeting Voicemail Edit

# Voicemail

Lawsuit 4/11/20  
phone 00:32

Lawsuit 4/4/20  
phone 00:33

Lawsuit 4/1/20  
phone 00:30

Lawsuit 3/31/20  
phone 00:32

Lawsuit 3/31/20  
phone 00:42

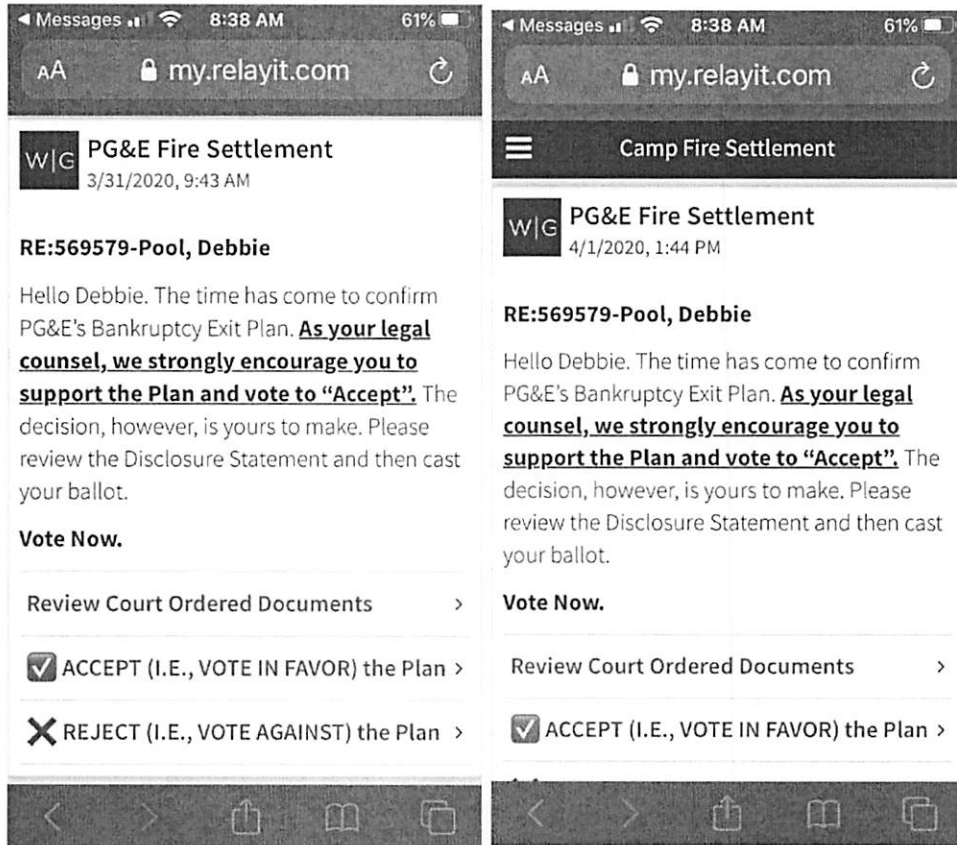
Lawsuit 3/30/20  
phone 00:35

Favorites Recents Contacts Keypad Voicemail

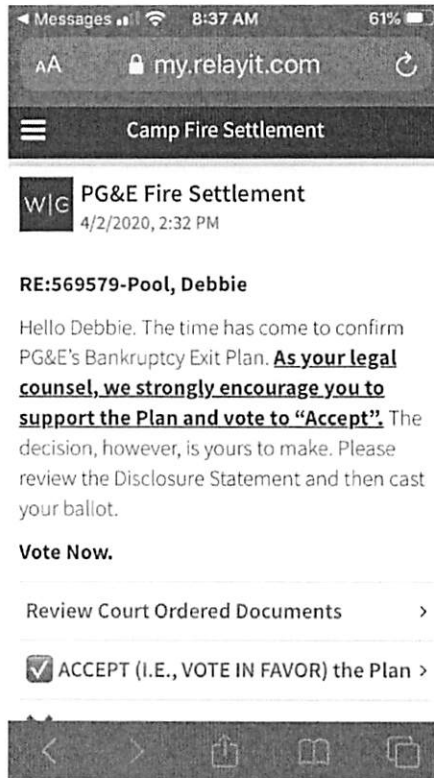
DECLARATION OF DEBBIE POOL

EXHIBIT D

Text Messages



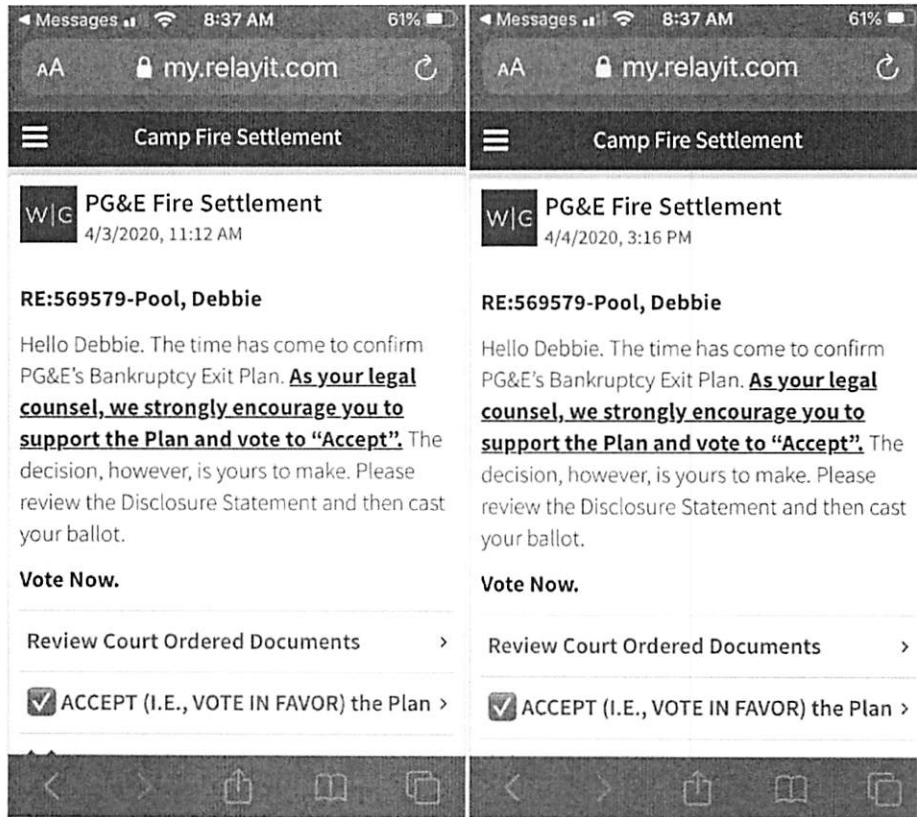
DECLARATION OF DEBBIE POOL



DECLARATION OF DEBBIE POOL

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DECLARATION OF DEBBIE POOL

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